LF003

REMARKS

In the Claims

Claim 12 was previously rejected under **35 U.S.C. 103(a)** as being unpatentable over Sacks in view of Aelion et al.without identifying the Aelion reference. The number of the Aelion patent, United States Patent Number 3,337,930, was given in the Office Action dated February 14, 2006. The Examiner stated that the previous reply was not fully responsive to the prior Office Action.

Applicants disagree that the previous reply was not fully responsive as all prior art that could be identified was properly dealt with. It is not evident what else the reply could have included to make it fully responsive since the Aelion reference was not available.

As stated in the previous reply, applicants can agree that Sacks discloses a rotatably journaled drum (20) defining a drum axis with smooth surfaces (20, 22, 24), an ancillary shaft (12) adjacent to the drum inclined to the drum, and a filament (18) wrapped around the drum and shaft. However, Sacks does not disclose a plurality of filaments being wrapped around the drum and shaft.

Aelion shows a single strand of filaments collectively (as a group) wrapped around pairs of identical parallel drums but not a plurality of filaments individually wrapped around a combination of a drum and an ancillary shaft and not any angled arrangement of rolls.

Neither reference contains any suggestion to combine the two teachings. Sacks dos not suggest to wrap more than one filament around the angled arrangement. On the contrary, Sacks is already concerned with avoiding an excessive required length of the rolls (See column 1, lines 34-38). A plurality of filaments, however would inevitably lengthemn the roll.

Since Aelion, only shows one strand, not a plurality of individually wrapped filaments as in the present invention, does not contain an ancillary shaft, the teaching of Stacks regarding the angled arrangement cannot be transferred to the Aelion arrangement. In arguendo, even if it could be transferred, the combination would not result in the present invention.

LF003

Claim 12 was amended in order to clarify that the filaments are being wrapped around the drum/shaft arrangement individually, not as a strand. This feature is evident from Figure 4 of the drawings and from the use of the word "each" in the specification on Page 4, last paragraph, line 3. Also, as not all features this embodiment has in common with presious embodiments is explicitly mentioned in the description of figure 4, reference is made to page 3, second paragraph of the Detailed Description of the Drawings, line4, of the specification, which deals with the embodiment of Figure 1. here it says that each take-up slot takes one filament. While figure 4 does not have slots per se, the arrangement of the filaments is the same.